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ALEX TAVAREZ, OFFICE MANAGER

July 20, 2023

Via-ECF:

Honorable Gregory H. Woods
Southern District of New York
United States District Court
Daniel Patrick Moynihan US Courthouse
500 Pearl Street
New York, New York 10007

Re: Emergency Request for Adjournment
Zivkovic v. Valbella at the Park LLC
Index No. 22-cv-07344-GHW
Our File: F11300

Dear Judge Woods:

We send this letter pursuant to Rule 1(E) of Your Honor's Individual Rules of Practice, and, as set forth below, we respectfully submit that this letter falls within the "emergency" exception to that Rule.

Approximately an hour and a half ago, our firm was contacted by Baker & Hostetler LLP, counsel for Rosey Kalayjian in the related matter entitled *Zivkovic v. Laura Christy LLC*, Index No. 17-cv-00553. Counsel advised that, due to a serious family emergency, Ms. Kalayjian cannot appear at tomorrow's phone conference, on behalf of Oak Grove Road LLC, in which she holds a 90% interest, or Valbella at the Park LLC (in which Oak Grove Road LLC holds a 50% interest).

Accordingly, based upon the foregoing, we respectfully request a brief adjournment of tomorrow's phone conference so that Ms. Kalayjian may appear next week as directed by Your Honor's Order dated July 17, 2023. Our office is available on Monday, July, 24, 2023 at any time before 1:00 p.m. as well as any time after 11:00 a.m. on Tuesday July 25, 2023 and Wednesday July 26, 2023.

At approximately 1:30 p.m. today, I discussed this unforeseen emergency with Plaintiff's counsel, Lucas Buzzard, Esq., who advised me that the Plaintiff cannot consent to any adjournments or extensions of time.

Accordingly, I am now writing to the Court directly with said request. This is the first request for such relief.

Respectfully submitted,

/s/Fred L. Seeman

Fred L. Seeman, Esq.

Cc: All counsel via electronic filing

Cc: Clients via email